

FILED
US DISTRICT COURT
DISTRICT OF ALASKA

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WILLIAM B. CAREY, 8212160
Attorney for Defendant
SUSAN C. MCKITRICK
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Anchorage, Alaska 99503

Telephone: (907) 272-4255
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SUSAN C. MCKITRICK,

Defendant.

Case No. J05-0004-4 (HRH) *ch*

**MOTION ON SHORTENED TIME FOR MODIFICATION OF CONDITIONS
OF RELEASE**

COMES NOW, the Defendant SUSAN C. MCKITRICK, though counsel, WILLIAM B. CAREY, and moves the Court on shortened time for an order modifying her conditions of release to provide that the defendant be permitted to stay at the family home while her mother and third party custodian, Mellanie Eisner, works at her business. This proposal would essentially have Ms. MCKITRICK at home at any time that she is not in the presence of her third party custodian. Electronic monitoring would not be required. A hearing at the Court's earliest convenience is requested.

This motion is not opposed by defendant's probation and pre-trial services officer, Chris Liedike. Mr. Liedike has confirmed to counsel for Ms. MCKITRICK that her performance during her release has been completely satisfactory and that he would not oppose this arrangement for the period leading up to sentencing, which is

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presently scheduled for January 9 in Anchorage.

Attempts to contact Assistant U.S. Attorney James Goeke have been unsuccessful. His position on this motion is unknown.

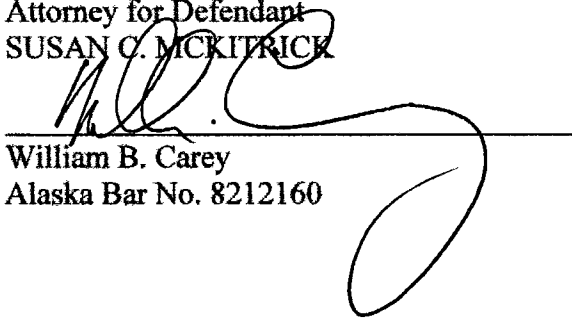
Ms. MCKITRICK further requests that she be permitted to travel to Anchorage on her own sometime on the weekend prior to her sentencing on Monday, January 9. She would stay with her sister on her arrival in Anchorage up until sentencing when it is expected that she will be remanded. A similar arrangement worked satisfactorily at the time of Ms. MCKITRICK's change of plea in this matter.

This arrangement is likewise not opposed by the Federal Probation Office and the Assistant U.S. Attorney assigned to this case.

This motion is supported by the attached affidavit of WILLIAM B. CAREY.

DATED at Anchorage, Alaska this 8 day of December, 2005.

LAW OFFICE OF WILLIAM B. CAREY
Attorney for Defendant
SUSAN C. MCKITRICK

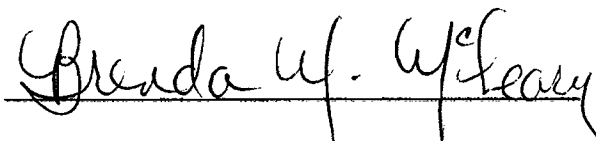

William B. Carey
Alaska Bar No. 8212160

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of December, 2005, a true and correct copy of the foregoing was hand delivered to the following:

Assistant U.S. Attorney James Goeke
222 West 7th Ave, #9 Room 253
Anchorage AK 99513-7567

Chris Liedike
Pretrial Services Officer
222 W. 7th Ave, #48, Room 68
Anchorage AK 9913-7562



WILLIAM B. CAREY, 8212160
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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.) Case No. J05-0004-4 (HRH)
)
SUSAN C. MCKITRICK,)
)
Defendant.)

AFFIDAVIT OF COUNSEL

STATE OF ALASKA)
) :ss
THIRD JUDICIAL DISTRICT)

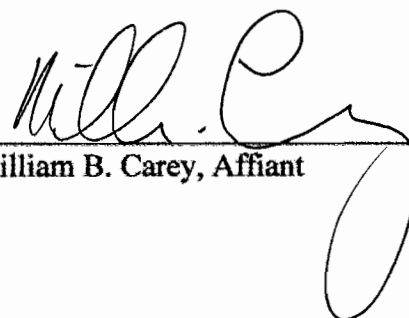
I, WILLIAM B. CAREY, being first duly sworn, do freely and voluntarily
state as follows:

1. I am the CJA appointed attorney for the Defendant, SUSAN C.
MCKITRICK.

2. All statements of fact contained in the accompanying motion are true
and accurate to the best of my knowledge.

FURTHER YOUR AFFIANT SAITH NAUGHT.

DATED this 7 day of December, 2005.



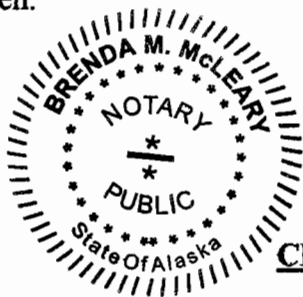
William B. Carey, Affiant

WILLIAM B. CAREY
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STATE OF ALASKA)
)
 :SS
THIRD JUDICIAL DISTRICT)

THIS IS TO CERTIFY that on this 7th day of December, 2005, before me, the undersigned, a Notary Public in and for the State of Alaska, personally appeared WILLIAM B. CAREY, known to me and to me known to be the individual named in and who executed the foregoing document and he acknowledged to me that he signed and sealed the same as his free and voluntary act for the uses and purposes therein set forth.

WITNESS my hand and notarial seal the day and year first hereinabove written.



Brenda M. McLeary
Notary Public in and for Alaska
My Commission expires: 27 July 2009

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of December, 2005, a true and correct copy of the foregoing was hand delivered to the following:

U.S. Attorney
222 West 7th Ave, #9 Room 253
Anchorage AK 99513-7567

Chris Liedike
United States Probation Officer
222 W 7th Ave, #48, Rm. 168
Anchorage AK 99513-7562

Brenda M. McLeary

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